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July 23, 2007

Secretary
Department of Telecommunications and Cable
Commonwealth of Massachusetts
One South Station, 2nd Fl.
Boston, MA 02110

Re: D.T.E. 03-50

Dear Secretary:

In accordance with the Department's January 14, 2000 Order in D.T.E. 99-271, enclosed are copies of the revised New York State Carrier to Carrier ("C2C") Guidelines reflecting changes approved by the New York Public Service Commission by order dated July 20, 2007 ("*PSC Order*"). These Guidelines were filed with the New York PSC on July 20, 2007.

Today's filing consists of the following documents: (1) the July 20, 2007 New York PSC Order, (2) a red-lined version of the East Carrier-to-Carrier Guidelines and Appendices to reflect changes made pursuant to the *PSC Order*, and (3) a clean copy of the entire, updated Carrier-to-Carrier Guidelines and Appendices.

The metric changes approved in the *PSC Order* are consensus changes to the Guidelines recommended by the New York Carrier Working Group.¹ The principal revisions to the Guidelines are changes to Metric OR-6, "Order Accuracy," and related provisions of Appendix M.² These revisions are intended to improve the accuracy of Sub-metric OR-6-01, "% Service Order Accuracy," and simplify the process for performing this measurement. They do this by consolidating measurements for Resale and UNE Loop/Complex/LNP into a single measurement to help ensure there is an adequate sample size for the monthly measurement, removing from the measurement three order fields that experience has shown do not need to be reviewed, and comparing

¹ *July 20, 2007 NY PSC Order*, pp. 1, 3 and 6. The New York Carrier Working Group includes New York State Department of Public Service staff, Verizon NY and interested CLECs, who participate in the New York PSC's on-going collaborative on carrier-to-carrier service quality measurements and standards.

² *July 20, 2007 NY PSC Order*, pp. 3-5 and Attachment 1, Section B.

the order due date field to the Local Service Request Confirmation (“LSRC”) rather than to the Local Service Request (“LSR”). The revisions are described in Attachment 1, Section B of the New York PSC’s order.

The revisions also include nine administrative changes.³ These revisions are described in Attachment 1, Section A of the New York PSC’s order.

Thank you for your assistance in this matter.

Very truly yours,

/s/ John L. Conroy

John L. Conroy

Enclosures

cc: Michael Isenberg, Director – Telecommunications Division
Julie Westwater, Esquire, Hearing Officer
Attached Service List (via e-mail)

³ July 20, 2007 NY PSC Order, p. 3 and Attachment 1, Section A.